



USDS SDNY

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ELECTRONICALLY FILED

DOC #:

DATE FILED: 10/31/07

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One Saint Andrew's Plaza
New York, New York 10007

OCT 31 2007

U.S. DISTRICT JUDGE
S.D.N.Y.

October 31, 2007

BY FAX 212-805-7901

Honorable Harold Baer, Jr.
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Manokhin, Derevianko, & Tursunov
07 Cr. 815 (HB)

Dear Judge Baer:

The Government writes to respectfully request an adjournment and that time be excluded, pursuant to 18 U.S.C. § 3161(h) (8) (A), from Thursday, November 1, 2007, through Tuesday, November 6, 2007, in the interests of justice pursuant to the Speedy Trial Act. A pre-trial conference in this matter was previously scheduled for November 1, 2007, and time was excluded through that date. The Government understands that Your Honor is next available for a conference possibly on November 2, 2006. The Government therefore requests that the conference adjourned to November 2, 2007, and that time be excluded until that date.

Such an exclusion will enable the defendants to review discovery in the case and to determine what, if any, motions to file. It will also enable the defendants to have discussions with the Government regarding a possible disposition of this case without trial. Accordingly, excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial.

I have communicated with counsel for defendant Vyecheslav Manokhin and Vladimir Derevianko, who consent to the request for the adjournment. I have also left telephone messages regarding this request with counsel for defendant Kamiljan Tursunov.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By: Michael Farbiarz/Iris Lan

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Not sure I understand what you are asking for but if it is to move the trial to November 2 at 11 AM to accommodate both parties something else you will have to wait against

SO ORDERED:

Harold Baer, Jr. U.S.D.

10/31/07

Endorsement:

Not sure I understand what you are asking for but if it is to move the PTC to November 2 at 11:45 i.e., same time and to exclude the time both are acceptable - if its something else you will have to write again.